

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RowVaughn Wells, Individually and as
Administratrix Ad Litem of the Estate of
Tyre Deandre Nichols, deceased.

Case No. 2:23-CV-02224-MSN-atc

Plaintiff,

vs.

**PLAINTIFF’S UNOPPOSED
MOTION FOR ENTRY OF
AGREED PROTECTIVE
ORDER**

The City of Memphis, a municipality;
Chief Cerelyn Davis, in her official capacity;
Emmitt Martin III, in his individual capacity;
Demetrius Haley, in his individual capacity;
Justin Smith, in his individual capacity;
Desmond Mills, Jr., in his individual capacity;
Tadarrius Bean, in his individual capacity;
Preston Hemphill, in his individual capacity;
Robert Long, in his individual capacity;
JaMichael Sandridge, in his individual capacity;
Michelle Whitaker, in her individual capacity;
DeWayne Smith, in his individual capacity and
as an agent of the City of Memphis.

Defendants.

**PLAINTIFF’S UNOPPOSED MOTION FOR ENTRY OF
AGREED PROTECTIVE ORDER**

Plaintiff, RowVaughn Wells, by and through her attorneys, hereby files this Unopposed Motion for Entry of Agreed Protective Order. In support thereof, Plaintiff states as follows:

1. During the course of this matter, both Plaintiff and Defendants will require the use of certain private or confidential information, including but not necessarily limited to the investigative files of the Memphis Police Department and other law enforcement investigations of the underlying incident in this litigation.
2. The non-stayed parties in this litigation have agreed to the entry of a Protective Order, attached hereto as Exhibit 1, that shall govern the use of certain sensitive information, including the documents anticipated to be received from the Memphis Police Department Inspectional Services Bureau and other law enforcement agencies.
3. Counsel for Defendants Davis, Smith, Hemphill, City of Memphis, Whitaker, Long, and Sandridge indicated via email that they are in agreement.
4. As of today's filing, Counsel for Defendant Long has not yet responded to the email requesting his position on April 19, 2024.
5. The Protective Order specifies the conditions under which private, sensitive and/or legally confidential documents and information must be used, exchanged, and protected in this litigation.
6. This Protective Order allows the parties to disclose information in response to discovery requests.
7. This Protective Order is justified by Federal Rule of Civil Procedure 26(c) and is necessary in order for the parties to obtain and use relevant and essential discovery.

WHEREFORE, Plaintiff respectfully requests that this Court enter the Agreed Protective Order attached to this Motion as Exhibit 1.

Respectfully submitted,

Dated: April 24, 2024

/s/ Bhavani Raveendran
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CERTIFICATE OF CONSULTATION

I, Bhavani Raveendran, hereby certify that I contacted all participating defense counsel via email on April 19, 2024 to ascertain whether Defendants objected to the instant motion. On April 19, 2024 and April 22-24, 2024 counsel for Defendant EMTS Whitaker, Sandridge, and Long, Defendant Hemphill, Defendant DeWayne Smith, Defendant City and Defendant Davis indicated they did not have an objection. No other defendants responded.

s/ Bhavani Raveendran

Bhavani Raveendran

CERTIFICATE OF SERVICE

I, Bhavani Raveendran, hereby certify that on April 24, 2024, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, and that upon filing, such system will serve a copy of the foregoing upon all counsel of record in this action.

s/ Bhavani Raveendran

Bhavani Raveendran